

Exhibit 6-1

Direct Talc Personal Injury Claim Solicitation Notice

THIS NOTICE IS NOT A SOLICITATION OF VOTES TO ACCEPT OR REJECT THE CHAPTER 11 PLAN OF REORGANIZATION OF THE DEBTOR. VOTES ON A CHAPTER 11 PLAN MAY NOT BE SOLICITED UNLESS AND UNTIL A DISCLOSURE STATEMENT HAS BEEN APPROVED BY THE BANKRUPTCY COURT PURSUANT TO SECTIONS 1125 AND 1126 OF THE BANKRUPTCY CODE.

TO ENSURE TIMELY SOLICITATION OF YOUR CLIENTS' VOTES, THE DEBTOR REQUESTS THAT YOU RETURN THE ENCLOSED CERTIFIED PLAN SOLICITATION DIRECTIVE TO THE SOLICITATION AGENT ON OR BEFORE AUGUST 15, 2023.

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**NOTICE OF (I) PROCESS FOR
SOLICITING VOTES OF HOLDERS OF DIRECT
TALC PERSONAL INJURY CLAIMS TO ACCEPT OR
REJECT AMENDED CHAPTER 11 PLAN OF REORGANIZATION OF
LTL MANAGEMENT LLC, (II) DEADLINE FOR ATTORNEYS TO SUBMIT
CERTIFIED PLAN SOLICITATION DIRECTIVE, AND (III) RELATED DEADLINES**

TO: ATTORNEYS REPRESENTING DIRECT TALC PERSONAL INJURY CLAIMS

PLEASE TAKE NOTICE OF THE FOLLOWING:

1. On April 4, 2023, the above-captioned debtor, LTL Management, LLC (the “Debtor”) commenced a voluntary case under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of New Jersey (the “Bankruptcy Court”).

2. On June 26, 2023, the Debtor filed the *Amended Chapter 11 Plan of Reorganization of LTL Management LLC* [Dkt. 912] (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the “Plan”).² On July 11, 2023, the Debtor filed (i) the *Disclosure Statement for Amended Chapter 11 Plan of Reorganization of LTL Management LLC* [Dkt. [●]] (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the “Disclosure Statement”) and (ii) a motion [Dkt. [●]] (the “Solicitation Procedures Motion”) to (a) approve form and manner of notice of hearing on the Disclosure Statement, (b) approve the Disclosure Statement, (c) establish certain procedures for soliciting and tabulating votes to accept or reject the Plan (the “Solicitation Procedures”), which are attached to the proposed order approving the Solicitation Procedures Motion as Exhibit 2, (d) schedule a hearing on confirmation of the Plan, and (e) grant related relief.

3. The Bankruptcy Court has scheduled a hearing for **August 22, 2023 at 10:00 a.m. (prevailing Eastern Time)** (the “Disclosure Statement Hearing”)³ to determine whether to, among other things, approve the proposed Disclosure Statement as containing “adequate information” within the meaning ascribed to such term in section 1125 of the Bankruptcy Code and approve the proposed Solicitation Procedures, including the allowance of Talc Personal Injury Claims for the limited purpose of voting on the Plan in the amount of \$1.00 per claimant.⁴

4. The Solicitation Procedures Motion sets forth the proposed notice and voting procedures applicable to you and your clients who may hold Direct Talc Personal Injury Claims

² Capitalized terms used but not otherwise defined herein have the meanings given to such terms in the Plan or the Solicitation Procedures (as defined herein), as applicable.

³ The Disclosure Statement Hearing may be continued from time to time without further notice other than the announcement of the adjourned date(s) at the Disclosure Statement Hearing or any continued hearing or as indicated in any notice of agenda of matters scheduled for hearing filed with the Bankruptcy Court. If the Disclosure Statement Hearing is continued, the Debtor will post the new date and time of the Disclosure Statement Hearing to <https://dm.epiq11.com/ltl>.

⁴ The Solicitation Procedures also propose to disallow Indirect Talc Personal Injury Claims for which a timely Proof of Claim is not filed by the applicable Claims Bar Date.

against the Debtor. The clients you represent who hold Direct Talc Personal Injury Claims are referred to herein as your “Clients.”

5. As explained in further detail in the enclosed, the Certified Plan Solicitation Directive provides for you to select your preferred method for the solicitation of each of your Client’s vote to accept or reject the Plan from the following solicitation methods: (i) the Master Ballot Solicitation Method, (ii) the Individual Solicitation Methods (either (a) Direct or (b) Indirect), and (iii) the Hybrid Solicitation Method. While these proposed solicitation methods are designed to streamline and expedite the delivery of information to your Clients, increase voter participation, and ensure that holders of Direct Talc Personal Injury Claims are empowered to make informed decisions regarding whether to accept or reject the Plan, each voting decision rests exclusively with each Client. In order to complete the Certified Plan Solicitation Directive, you must submit a list of the names, last four digits of the Social Security Number for each of the Clients who has a Social Security Number, the month, date, and year of birth for each Client that does not have a Social Security Number, and addresses (if applicable) of your Clients (the “Client List”). The Solicitation Agent emailed you a Client List in the required format containing the names of your known Clients. It is recommended that you use the emailed Excel file to submit your Client List. You must submit the Client List (via email) and the Certified Plan Solicitation Directive (via mail or email) so that each is received by Epig Corporate Restructuring, LLC (the “Solicitation Agent”) by **August 15, 2023**.

- i. **Master Ballot Solicitation Method:** This method requires you to solicit, collect, record and submit the votes of each of, as applicable, your Clients or your Master Ballot Clients whose votes are recorded on the Master Ballot.
- ii. **Individual Solicitation Methods (Direct or Indirect Solicitation Method):** With these methods, the Solicitation Agent will provide Ballots for your Clients (either directly or indirectly) with information and instructions for the Ballots to be returned directly to the Solicitation Agent.
- iii. **Hybrid Solicitation Method:** This method is a combination of the Master Ballot Solicitation Method and the Individual Solicitation Methods and it requires you to specify for each Client on your Client List whether (a) you will solicit, collect, record and submit or procedurally cast the vote of such Client on the Plan by Master Ballot, or (b) such Client will submit a Ballot casting the Client’s vote on the Plan directly to the Solicitation Agent via one of the Individual Solicitation Methods.

6. If your Firm is retained by additional Clients following the submission of its Certified Plan Solicitation Directive, the Firm must submit a supplement to its Certified Plan Solicitation Directive, which the Firm shall be deemed to have certified consistent with its original Client List, provided that a Firm may not change the solicitation method selected in the Firm’s initial Certified Plan Solicitation Directive or otherwise required under the Solicitation Procedures unless otherwise agreed to among the Debtor, the Solicitation Agent, and the Firm. In the event that a Firm no longer represents a Client after submitting its Certified Plan

Solicitation Directive, the Firm **must** provide notice to the Solicitation Agent that the Firm no longer represents such Client and send the information relating to the name, address, and email (if known) of such Client or holder of a Claim to the Solicitation Agent.

7. Pursuant to the Solicitation Procedures, the Solicitation Agent will serve copies of the Disclosure Statement (as approved by the Bankruptcy Court), the Plan, various documents related thereto, and an appropriate Ballot in accordance with the instructions set forth on the Certified Plan Solicitation Directive. Copies of the Disclosure Statement and the Plan also are available for review on the Solicitation Agent's website at <https://dm.epiq11.com/ltl>. In addition, copies of the Disclosure Statement and Plan are available upon request by contacting Epiq Corporate Restructuring LLC, at LTLVote@epiqglobal.com or at (888) 431-4056 (Toll-Free) or +1 (503) 822-6762 (International).

8. **You must return the Certified Plan Solicitation Directive (via mail or email) and a completed Client List (via email) on or before August 15, 2023. If you do not timely return the Certified Plan Solicitation Directive, you still must submit a certified Client List including addresses and the Solicitation Agent will provide pre-addressed Solicitation Packages with customized Ballots in sealed packages to you for you to add postage and deliver to your Clients; provided that, if you do not provide a Client List including addresses to the Solicitation Agent, you will be required to address the Solicitation Packages before adding postage and delivering the packages to your Clients.**

9. **The Solicitation Agent will endeavor to identify and reconcile the Client Lists with any conflicting records indicating that an individual holder of a Direct Talc Personal Injury Claim may be represented by more than one Firm or has a duplicative Direct Talc Personal Injury Claim.**

To ensure the timely solicitation of each of your Client's votes on the Plan, you must complete and return the enclosed Certified Plan Solicitation Directive (via mail or email) and Client List (via email) (i) by first class mail: LTL Management LLC, c/o Epiq Ballot Processing Center, P.O. Box 4422, Beaverton, OR 97076-4422, (ii) by overnight courier, or hand delivery to: LTL Management LLC, c/o Epiq Ballot Processing, 10300 SW Allen Boulevard, Beaverton, OR 97005, or (iii) via email to LTLVote@EpiqGlobal.com, so that both are received by the Debtor's Solicitation Agent on or before August 15, 2023.

Dated: [_____]

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